REMARKS

Amendments to the Claims

Independent claims 1 and 10 are amended to clarify the wording to make it clear that "the language information module and the font database are stored in storage device(s) of the mobile unit being different than the first storage device" (claim 1 – emphasis added). In this way, the interface module is stored in a different storage device than the language information module and font database. The previous wording of claims 1 and 10 was a little bit unclear and could also have been interpreted differently. No new matter is entered and claims 1 and 11 now more closely match the limitations presented in method claims 18 and 21.

Claims 1, 5-10, 14-18, 20-21, 23-29 are rejected under 35 USC 102e as being anticipated by Lee (hereinafter Lee), US Patent Application Publication No. 2004/0054745, in view of Cistulli (hereinafter Cistulli), US Patent No. 5,946,376.

Applicant firstly notes that it appears the Examiner made a small error in stating that the claims are rejected under 35 USC 102(e). In the following, the applicant assumes the Examiner meant to state that the claims are rejected under 35 USC 103(a). The reason is, as the Examiner stated, neither Lee nor Cistulli teach all the claimed features of the present invention. Additionally, the Examiner quoted 35 USC 103(a) on page 2 of the Office action but then stated 35 USC 102(e) apparently by mistake on page 3.

With that in mind, applicant notes that the Examiner has changed the rejection of independent claims 1, 10, 18, and 21 from USC 102(e) to 35 USC 103(a) according to the teachings of the Lee and Cistulli because of the amendment in the last response by applicant adding structural features of a first storage device storing the interface module being different from the storage device storing the language information module and the font database.

The examiner stated, "Lee does not specifically teach separation of its interface module from the language and font data. However, Cistulli teaches a cellular phone comprising separate memory and flash memory areas for language translation, BIOS functions, and

'Variables ISR' (see Cistulli Figure 1 at least items 35, 55, 25, along with column 2 lines 27-58). It is noted that BIOS, RAM, EEPROM, and Flash reflect different forms of storage devices. It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Cistulli's memory storage separation to Lee's memory section, providing Lee the benefit of separate memory areas for languages and fonts, which are typically updated more frequently then basic interface functions." Applicant notes that there is no directly quoted motivation provided by the Examiner for such a combination cited from Cistulli. Instead, there is an indirect motivation "providing Lee the benefit of separate memory areas for languages and fonts, which are typically updated more frequently then basic interface functions." (emphasis added) Applicant also notes that the Examiner did not provide any support for either the benefit or the actual features of the underlined portion.

Concerning a second difference between the claimed invention and the cited references of Lee and Cistulli, the Examiner stated, "Although Lee does not specifically teach storage of languages / fonts by a 'manufacturer', however, since a mobile unit (eg a cell telephone) typically contains at least one default language/font for use in its home country (ie a phone purchased in Japan will generally have by default, Japanese instructions, it would have been obvious to one of ordinary skill in the art at the time of the invention for a manufacturer to load various language information accordingly, so as to provide a phone which can at least be understood by users when purchased within the user's country."

Concerning the above statements by the Examiner supporting the obviousness type rejection, the applicant respectfully disagrees. The applicant asserts that the above described combinations would not be apparent and obvious to try given the teachings of the cited references and general knowledge. In particular, applicant asserts that a person skilled in the art would not see any benefit of having separate memory device for the interface module than for the languages and fonts (note: the claimed feature of the present invention is a different storage device, not a different area) for storage by a manufacturer. The motivation stated by the Examiner for such a features is not provided by Cistulli or Lee, and as applicant will explain, this motivation would not be apparent to a person skilled in the art without further

inventive process. Additionally, as will be explained, the results of the claimed combination (allowing manufactures easy expansion into different markets) were unexpected. That is, the different storage devices perform more in combination than just storage of data that is done in isolation.

The main arguments by the applicant can be summed up as follows:

Neither Lee nor Cistulli teach each and every limitation of the present invention. In particular, neither Lee nor Cistulli teach storing the user interface module in a different storage device than the language module and font database. Therefore a combination of Lee and Cistulli would also not teach each and every limitation claimed by the present invention without further inventive process. Additionally, the statement "providing Lee the benefit of separate memory areas for languages and fonts, which are typically updated more frequently then basic interface functions" stated by the Examiner is actually not obvious to a person of ordinary skill in the art given all the facts. There is instead a non obvious result occurring from storing the interface module in a different storage device from the font database and language information. As stated in the present invention, this allows the languages to be independent and updated easily by manufactures. See paragraphs [38] and [39], also quoted in the last response. It is not simply a matter of each memory device performing the function that they perform separately. That is, in general, it is well known that memories are utilized to store information and that is what is taught by both Lee and Cistulli, however, the present invention realizes that there is a non-obvious result obtained if certain information (e.g., the interface module) is stored in a different memory from the other language information. Of course there are a plurality of prior art references such as Cistulli that show various designs using multiple types of physical memories, however, the applicant asserts it is not proper to simply state that it would be obvious to combine the feature of having multiple physical memories from Cistulli with Lee to result in the present invention. It would not be obvious because the memories do not simply perform their indented duties of storing data. Instead, by having multiple and separate memories to independently keep the interface module separate

from the language information (language module and font database), there is an unexpected result that manufacturers can simply change (either physically swap or modify through reprogramming) one memory device and then sell the phone in a new market. The phone is quickly released to market because only one part (one memory) needs to be updated. Additionally, it is not required to recompile the user interface code stored in the first memory, as would be required in the design of Cistulli. Further comments specifically detailing these arguments are provided in the below sections.

Not all features of the present invention taught by cited references

Lee, as a whole, is directed at a method of supporting multiple language for a mobile phone. According to the teachings of Lee, language packages are downloaded from a WAP gateway to choose by a user from a plurality of possible languages for the mobile phone. See paragraph [0025] and Figure 4 of Lee for example.

Cistulli, as a whole, is directed at a cell phone including a language translation feature. In particular, a button on the phone can be pressed at any time to translate the user interface of the phone to another language instantly. See the abstract of Cistulli.

The only feature of Cistulli that the Examiner has proposed would be obvious to combine with Lee is that in Cistulli memories 25 an 55 both contain parts of the language user interface and parameters and therefore the Examiner contends that the user interface is separate from the font database and language information. Applicant firstly disagrees and points out that Cistulli simply teaches that variables 86 are stored in memory 25, and other language functions are stored in user interface functions 55. Applicant notes that each language supported by the phone has its own user interface function stored in the user interface function 55. Note Japanese functions 60, English functions 65, and other language functions 70 in Figure 1 of Cistulli. That is, the user interface 55 is not stored separately from the language fonts and language functions, as in the present invention. Should a new language be added into or deleted from the cell phone 20 of Cistulli, the user interface functions 55 would need to be recompiled and updated in addition to the memory 25. Both memories

would need to be updated because Cistulli does not teach, "the interface module is stored in a first storage device of the mobile unit by a manufacturer of the mobile unit, and the language information module and the font database are stored in storage device(s) of the mobile unit being different than the first storage area by the manufacturer of the mobile unit", as is claimed in claim 1 of the present invention. For this reason, applicant asserts that neither Lee nor Cistulli teaches each and every feature of the present invention. A combination of Lee with Cistulli would still need to be modified to ensure the user interface module is stored in a first storage device being different than the store device(s) storing the language information module and the font database. Thus, there is no support for the statement "providing Lee the benefit of separate memory areas for languages and fonts", which was stated by the Examiner in the rejection of claim 1.

A person skilled in the art would not be able to combine Lee and Cistulli into the present invention without further inventive process

The Federal Register (Vol. 72, No 195) includes "Examination Guidelines for Determining Obviousness Under 35 USC 103 in view of the Supreme Court Decision in KSR International Co. v. Teleflex Inc.". Of note in this article is that the Graham factual inquiries should first be determined:

1. Determining the scope and content of the prior art.
2. Ascertaining the differences between the claimed invention and the prior art.
3. Resolving the level of ordinary skill in the pertinent art.

As explained above, after conducting the Grapham factual inquires, it is apparent that in the prior art neither Lee nor Cistulli teach all the features of the present invention. Applicant points out that concerning this situation, the above quoted article in the Federal Register states that, "Office personal must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art."

The feature that must be obvious to one of ordinary skill in the art given all the facts at

hand is the following limitation of the present invention:

> "the interface module is stored in a first storage device of the mobile unit by a manufacturer of the mobile unit, and the language information module and the font database are stored in storage device(s) of the mobile unit being different than the first storage device by the manufacturer of the mobile unit." (claim 1)

As stated above, the different memories 25, 55 of Cistulli are merely provided to store information. There is no separation of specific language information from the user interface. Applicant asserts that it would not be obvious to a person skilled in the art that any benefit could be obtained by utilizing different storage devices in the design of Lee other than the expected benefit of storing data. In contrast to what the person of ordinary skill in the art would do, the present invention organizes the memories differently than both Lee and Cistulli by storing specific language information (language module and font database) in a memory or memories being different than the first memory storing the interface module. The act of storing all the specific language data in a different memory device than the user interface leads to an expected result. Specifically, the present invention obtains an unexpected and beneficial result of allowing manufactures to easily update languages in a cell phone for a new market. Only one component of the cell phone design needs to be changed to accommodate a new or deleted language. Additionally, the user interface itself does not need to be recompiled. See paragraph [39] stating, "Hence, the interface module does not need to be modified, which means the source code of the original interface module does not need to be modified and re-compiled to generate the needed interface module."

Summary

In summary, the applicant asserts that neither Lee nor Cistulli teach storing the interface module in a first storage device being different than the storage device(s) utilized to store the language module and font data base. Therefore a combination of Lee and Cistulli would also

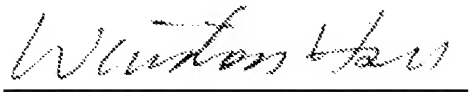
not teach this feature without further inventive process. In particular, it would not be obvious to a person of ordinary skill in the art given all the facts. There is instead a non obvious result occurring from storing the interface module in a different storage device from the font database and language information. As stated in the present invention, this allows them to be independent and updated easily by manufactures. It is not simply a matter of each memory device performing the function that they perform separately. Applicant asserts it is not proper to simply state that it would be obvious to combine the feature of having multiple physical memories from Cistulli with Lee to result in the present invention. It would not be obvious because the memories do not simply perform their indented duties of storing data. Instead, by having multiple and separate memories, there is an unexpected result that manufacturers can simply change (either physically swap or modify through reprogramming) one memory and then sell the phone in a new market. The phone is quickly released to market because only one part (one memory) needs to be updated. Additionally, it is not required to recompile the user interface code stored in the first memory.

In light of the above arguments, reconsideration of independent claims 1, 10, 18, and 21 is respectfully requested. The dependent claims should be found allowable for at least the same reasons as their respective base claims.

Conclusion:

Thus, all pending claims are submitted to be in condition for allowance with respect to the cited art for at least the reasons presented above. The Examiner is encouraged to telephone the undersigned if there are informalities that can be resolved in a phone conversation, or if the Examiner has any ideas or suggestions for further advancing the prosecution of this case.

Sincerely yours,



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